

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Lifeline and Link Up Reform and Modernization)	WC Docket No. 11-42
)	

**OGLALA SIOUX TRIBE
PETITION FOR RECONSIDERATION AND EMERGENCY RELIEF
TO
REINSTATE CELLULAR AND DATA SERVICE TO OVER 1,700 RESIDENTS
OF THE PINE RIDGE INDIAN RESERVATION**

Stephen Pourier, Sr., Director
Oglala Sioux Tribe Utilities Office
US Highway 18 East & Moccasin Rd.
Pine Ridge, SD 57770
Main: 605-867-5600
sjpourier@goldenwest.net

Jonathan E. Canis
Canis PLLC
4236 Mathewson Drive, N.W
Washington DC 20011
202-294-5782
jon@canispllc.com

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SUMMARY

The Pine Ridge Reservation of the Oglala Sioux Tribe (“OST”) is one of the most remote rural places in the United States – its population of almost 21,000 people is spread over 3,469 square miles, an area bigger than the states of Delaware and Rhode Island combined. It is also one of the poorest places in the country – in the largest county on the Reservation, 53.9% of the population lives below the poverty line, and unemployment is endemic.

One of the best things to happen on Pine Ridge in recent years was a new cellular service subsidized by the FCC’s Lifeline Universal Service Fund program. The new Lifeline Service was negotiated over a period of 10 months between AT&T and the Tribe, and it is an innovative and unique service that provides unrestricted voice and text service, a full-featured smartphone and inexpensive (and in wi-fi “hot spots” that exist in Tribal schools and government buildings, free) data service to impoverished residents of Pine Ridge. The service was immediately enormously popular – it was introduced in August 2016, and by the end of the year, almost 3,500 Pine Ridge residents proved their eligibility and were signed up for the service. This success is attributed to the quality of the service and the extraordinary efforts by AT&T and the Tribe, which spent substantial money and effort over several months in getting the word out to the people and in sending teams out across the Reservation to sign up eligible subscribers.

But in August 2017, AT&T and the Tribe discovered an unanticipated problem – the Lifeline Service subscribers were not “re-certifying” – *i.e.* proving that they were still impoverished and therefore eligible to receive the service. After investigating, the Tribe found multiple factors that made re-certification an insurmountable barrier for many subscribers – language and other cultural issues, the lack of computers or broadband access in the home to re-

certify online, and the impossibility of traveling dozens or hundreds of miles to the one AT&T store on the Reservation to re-certify in person.

As soon as the Tribe learned of this problem, OST President Scott Weston sent a letter to the Commission's Chairman and Office of Native Affairs and Policy, requesting emergency action to waive or extend the re-certification deadline, in order to prevent the service being turned off, which is required by the Commission's rules if re-certification is not completed. But the FCC took no action – over the next seven months, the Tribe and its pro bono telecom counsel had 15 contacts, meetings and ex parte filings with the Commission, repeatedly asking for a waiver or extension of the re-certification deadlines. During this time, AT&T was forced by the Commission's rules to shut off the Lifeline Service to **1,719** Pine Ridge residents.

Finally, on March 13, 2018, the Wireline Competition Bureau issued an order that granted the waivers sought by the Tribe – but without explanation, this relief was only granted prospectively, effectively denying the relief sought by the Tribe over the proceeding seven months, and preventing AT&T from restoring service to the 1,719 Lifeline Service subscribers that were turned off. Combined with the seven-month delay in taking action, the *Partial Waiver Order* is cruelly indifferent to the critical need for service to this impoverished rural population.

It is too late to prevent the Lifeline Service from being shut off to 1,719 of the poorest and most isolated people in the country. But it is not too late to ameliorate the damage by making the waivers retroactive so that AT&T can turn the service back on. The Oglala Sioux Tribe asks the Commission to amend the *Partial Waiver Order* to make the waivers retroactive. The Tribe asks that the Commission take this desperately needed action as quickly as possible.

TABLE OF CONTENTS

I. BACKGROUND: WHY OST URGENTLY REQUESTED TEMPORARY WAIVER OF THE LIFELINE RE-CERTIFICATION RULES, AND WHY SUCH A WAIVER WAS GRANTED IN PART BY THE WIRELINE COMPETITION BUREAU	2
A. The Pine Ridge Reservation of the Oglala Sioux Tribe Is One of the Poorest and Most Isolated Rural Places in the United States, and the Commission Has Recognized It Is Chronically Underserved in Both Telecom and Data Services	2
B. In 2016 the Oglala Sioux Tribe and AT&T Negotiated an Innovative Lifeline Service Arrangement that Brought Enormous Value to the Tribe.....	4
C. 10 Months After the Successful Rollout of the Lifeline Service, AT&T and the Tribe Discovered Unanticipated and Extensive Problems with the Re-Certification Process	6
D. As Soon as AT&T Alerted the Tribe of Problems in Re-Certification, the Tribe Sought Emergency Relief to Prevent Massive Service Shut-Offs, and Continued Those Efforts Continuously for Seven Months	8
E. The <i>Partial Waiver Order</i> Correctly Identifies the Desperate Need for a Temporary Waiver of the Re-Certification Rules, and the Commission’s Broad Authority to Grant It, but Inexplicably Only Grants the Waiver Prospectively – Which Effectively Denies Relief to the Tribe	9
II. GIVEN THE TRIBE’S REPEATED AND URGENT REQUESTS FOR RELIEF OVER A PERIOD OF SEVEN MONTHS, EQUITY, COMPASSION AND COMMON DECENCY REQUIRE APPLICATION OF THE WAIVERS RETROACTIVE TO AUGUST 29, 2017	10
III. THE TEMPORARY RETROACTIVE APPLICATION OF THE WAIVER PRESENTS VIRTUALLY NO RISK OF FRAUD OR ABUSE.....	11
IV. THE FULL RELIEF REQUESTED BY THE TRIBE IS URGENTLY NEEDED AND REQUIRES EMERGENCY ACTION BY THE COMMISSION	12
V. CONCLUSION.....	13

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The Oglala Sioux Tribe (“OST” or “Tribe”), by its Utilities Office and its pro bono telecom counsel, and pursuant to 47 U.S.C. § 1.429, hereby asks the Commission to revise on reconsideration order DA 18-245, adopted and released by the Wireline Competition Bureau on March 13, 2018 (“*Partial Waiver Order*” or “*Order*”). As discussed below, that *Order* purports to respond to numerous requests for emergency relief – made over a period of seven months – from burdensome and ineffective Lifeline re-certification regulations that have resulted in the termination of cell phone and data service to over 1,700 residents of the Pine Ridge Reservation, who rank among the poorest and most underserved populations in the United States. The Tribe, by this Petition, asks the Commission to take the partial waiver of Lifeline re-certification rules granted prospectively by the Wireline Competition Bureau and give it retroactive effect back to August 29, 2017 – the first date that the President of the Oglala Sioux Tribe requested emergency relief from this Commission to prevent the shut-off of service to Pine Ridge Lifeline Service subscribers. This simple action would allow the immediate restoration of cellular and data service to the **1,719** Pine Ridge residents who have lost that desperately needed service,

while providing adequate time for the Tribe, the Commission and NARUC to put in place Lifeline re-certification procedures that will be highly effective and appropriate to the living conditions and culture of the citizens of Pine Ridge.

I. BACKGROUND: WHY OST URGENTLY REQUESTED TEMPORARY WAIVER OF THE LIFELINE RE-CERTIFICATION RULES, AND WHY SUCH A WAIVER WAS GRANTED IN PART BY THE WIRELINE COMPETITION BUREAU

A. The Pine Ridge Reservation of the Oglala Sioux Tribe Is One of the Poorest and Most Isolated Rural Places in the United States, and the Commission Has Recognized It Is Chronically Underserved in Both Telecom and Data Services

The Pine Ridge Reservation of the Oglala Sioux Tribe is comprised of almost 21,000 people,¹ spread over 3,469 square miles – an area larger than the states of Delaware and Rhode Island combined.² It is one of the poorest Indian Tribes in the country – in its largest county, Oglala Lakota County, currently 53.9% of the population lives below the poverty line.³ The Commission has long recognized “the relatively low level of telecommunications deployment on Tribal lands and the distinct challenges in bringing connectivity to these areas” and the fact that “communities on Tribal lands have historically had less access to telecommunications services than any other segment of the population.”⁴

The Commission has also long recognized that “the federal government has a federal trust relationship with Indian Tribes, and this historic trust relationship requires the federal government to adhere to certain fiduciary standards in its dealings with Indian Tribes. In this regard, the Commission recognizes that the federal government has a longstanding policy of promoting tribal self-sufficiency and economic development as embodied in various federal

¹ <https://www.census.gov/data/tables/time-series/dec/cph-series/cph-t/cph-t-6.html>

² https://en.wikipedia.org/wiki/Pine_Ridge_Indian_Reservation

³ https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml#

⁴ *Connect America Fund*, 26 FCC Rcd 17663, at ¶ 479 (2011).

statutes.”⁵ In July of last year, Chairman Pai made an historic 6-day car trip in which he visited with numerous Indian Tribes and Tribal leaders of the Great Plains, and held a formal Consultation at the Rosebud Sioux Tribe. In a subsequent report to the National Congress of American Indians, the Chairman began by acknowledging that trust responsibility: “I honor and embrace that trust relationship and my responsibilities as the Chairman of the FCC.”⁶

In his report, the Chairman recounted a particularly poignant discussion at the Rosebud Consultation with Steve Pourier, the Director of the Oglala Sioux Tribe Utilities Office and a signatory to this Petition for Reconsideration:

Now, I said that I made 18 stops on this trip. None were more meaningful to me than my tribal consultation on the Rosebud Sioux Reservation in South Dakota. I had the opportunity to meet with representatives of many Tribes, from Oklahoma to Wisconsin.

The stories I heard over several hours stick with me. I met with a man named Stephen Pourier. Steve told me the story of a woman in his community who was found dead in her home, clutching her cellphone. She was in distress and dialed 911 38 times—but never got a response. There simply wasn’t wireless coverage. He told another story of three young men in an automobile accident whose car slid into a ravine. Their phones showed that they had been calling 911. But help never came because the calls never went through. I heard several other perspectives like these.

Remarks of FCC Chairman Ajit Pai at the National Congress of American Indians Mid-Year Conference, June 14, 2017, https://apps.fcc.gov/edocs_public/attachmatch/DOC-345347A1.pdf.

The Oglala Sioux Tribe is grateful to Chairman Pai for his embrace of the Commission’s trust responsibility, for his unprecedented listening tour of the Plains Tribes, and for hearing our

⁵ *Policy on Establishing a Government-to-Government Relationship with Indian Tribes*, Policy Statement, FCC 00-207, June 23, 2000.

⁶ Remarks of FCC Chairman Ajit Pai at the National Congress of American Indians Mid-Year Conference, June 14, 2017, https://apps.fcc.gov/edocs_public/attachmatch/DOC-345347A1.pdf.

stories about the critical importance – indeed, the life-or-death importance – of cellular and data service on the Pine Ridge Reservation.

B. In 2016 the Oglala Sioux Tribe and AT&T Negotiated an Innovative Lifeline Service Arrangement that Brought Enormous Value to the Tribe

AT&T Mobility was awarded Eligible Telecommunications Carrier (“ETC”) status to serve the Pine Ridge Reservation in 2011, following its acquisition of the former Alltel assets that were acquired, and in part divested by Verizon. The Commission premised its award on a general observation about the inadequacy of telecom service on Tribal lands: “The Commission has previously recognized that Tribal areas often experience particularly low levels of subscribership because of the very high cost of service, inadequate telecommunications infrastructure, and a lack of competitive service providers.”⁷ In conducting its public interest analysis of AT&T’s role as a service provider on Pine Ridge, the Commission stressed the emergency services and public health benefits of AT&T’s service:

We find that AT&T Mobility's universal service offering will provide a variety of benefits to consumers, including increased consumer choice and improved quality of service. For example, universal service support will enable AT&T Mobility to construct facilities and provide wireless services that may not otherwise exist on the Reservation. Moreover, the mobility of AT&T Mobility's wireless service will provide additional benefits to consumers on the Reservation. For example, access to wireless service will mitigate the health and safety risks associated with living and working in a remote and rural location, where consumers must often drive significant distances for work, school, medical attention, or other needs. Access to wireless communications services will also help ensure public safety. AT&T Mobility will also provide all of its customers with access to emergency services that are vital to those living in remote communities.⁸

⁷ *Petition of AT&T Mobility for Designation as an Eligible Telecommunications Carrier Pursuant to Section 214(e) of the Communications Act and Transfer of the Alltel Pine Ridge Reservation Eligible Telecommunications Carrier Designation*, WC Docket No. 09-197, DA 11-859 (released May 11, 2011), at ¶ 19.

⁸ *Id.* at ¶ 18 (footnotes omitted) (emphasis added).

It is notable that the ETC designation order emphasized the same life-threatening hazards of living in the extremely remote areas of Pine Ridge that so grabbed Chairman Pai's attention during his talk with Steve Pourier at the Rosebud Consultation.

In 2016, the Oglala Sioux Tribe and AT&T negotiated an innovative and unique service application centered on Tribal Lifeline subsidies. This process took 10 months to negotiate, and was approved by senior management at AT&T and by the OST Tribal Council. While the details of the service are subject to a non-disclosure agreement, the service provides unrestricted voice and texting service, a full-featured smartphone, and data services that are either prepaid, or available without charge in "hot spots" that exist in the Tribe's community centers, schools, hospital, government buildings, and some businesses. The service is 100% 4G – AT&T has recently completed the upgrade to all its cellular radios on Pine Ridge. The full details of this innovative plan were shared verbally and in a Powerpoint presentation at all meetings held by the OST and its representatives with Commission Staff.

The Lifeline Service was immediately hugely popular – service roll-out began on August 18, 2016, and by the end of the year, almost 3,500 residents of Pine Ridge met the eligibility criteria and signed up for the service. This enormous success reflected both the excellence of the service and the extraordinary effort undertaken jointly by AT&T and the Tribe in spreading the word about the service, and in conducting outreach across the Reservation to actively sign up eligible Pine Ridge residents. AT&T and OST took out ads in local papers, and conducted interviews and public service announcements over a period of several months on KILI Radio, the most popular and widely listened-to radio station covering Pine Ridge.

But most important were the efforts taken to physically sign up Pine Ridge residents. As noted above, Pine Ridge has more land area than the states of Delaware and Rhode Island

combined. AT&T has one store on the Reservation – in Pine Ridge Village in the Southeast corner of the Reservation. The distance from Wanblee – the largest town in the Northwest part of the Reservation – to the town of Pine Ridge is more than 75 miles. In a place where poverty and unemployment are endemic, and most of the population lacks cars, it was simply not feasible to optimize enrollment by having residents come to the Pine Ridge Village AT&T Store.

Instead, AT&T sent teams of AT&T personnel to each of the nine districts of the Reservation, and conducted multiple sign-up sessions at the Tribal community centers in those districts over a period of several months. This was an enormous effort – AT&T had to coordinate with the Tribal Council members and community center directors in each district, had to heavy up the wi-fi facilities in each community center so that they could support signing up multiple subscribers simultaneously, had to assign experienced AT&T personnel to make these outreach trips over a period of months, and had to hire security. In addition to assisting these efforts, the Tribe had to make arrangements for Lakota translators to be present to assist non-English speaking Pine Ridge residents, and had to issue new, current Tribal Identification Cards for the many residents who lacked them.

C. 10 Months After the Successful Rollout of the Lifeline Service, AT&T and the Tribe Discovered Unanticipated and Extensive Problems with the Re-Certification Process

Per the FCC’s rules, as the one-year anniversary of the service roll-out approached AT&T began notifying the new Lifeline Service subscribers of their obligation to re-certify their eligibility. In August, AT&T advised the Tribe and its telecom counsel that the rates of re-certification were extremely low – 10-20% at most, and that AT&T would be obligated under the Commission’s rules to turn off service for those Lifeline subscribers that failed to re-certify. AT&T informed the Tribe that the first service shut-offs would begin in a matter of weeks.

The OST and its telecom counsel tried immediately to determine the cause for these re-certification failures, and found that multiple logistical and cultural factors were at play:

- AT&T's preferred means of notifying subscribers of their re-certification obligation is voicemail. But Tribal members generally don't use voicemail, and most don't enable that feature on their phones. The predominant means of communications via phone on Pine Ridge is texting, but AT&T does not normally use that method of alerting customers.
- Notice was not provided in Lakota, meaning that many Pine Ridge residents – particularly older residents – who speak only Lakota were unable to receive notice of the re-certification obligations.
- In order to re-certify, subscribers have to click on a link on an AT&T website, and respond to a few questions. This is a simple and straightforward task in many households, but not in areas where poverty is endemic. Most Pine Ridge residents do not have computers or wi-fi access at home, and would be unable to use the website method of re-certifying even if they knew they had to.
- Re-certification at the AT&T Store in Pine Ridge Village is not a viable option for most subscribers – in a Reservation larger than Delaware and Rhode Island combined, where most residents do not have cars, in-person re-certification is an insurmountable task.
- Because the Lifeline service started roll-out in August of 2016, and enrolled most of its almost 3,500 subscribers over the following four months, re-certification had to take place during winter on Pine Ridge. The winters in South Dakota are brutal, and create an additional obstacle to re-certification, even if notice was received by the subscribers.

D. As Soon as AT&T Alerted the Tribe of Problems in Re-Certification, the Tribe Sought Emergency Relief to Prevent Massive Service Shut-Offs, and Continued Those Efforts Continuously for Seven Months

As noted above, the Tribe and its telecom counsel immediately investigated the causes for the very low re-certification rates, that we – like AT&T – had not anticipated. We determined that, given the cultural and logistical impediments to re-certification, it would take some time to implement reliable re-certification procedures that were appropriate for Pine Ridge. In the meantime, we faced a crisis – the vast majority of the almost 3,500 Lifeline Service subscribers signed up in the first four months after service was introduced, and would have their service shut off in large numbers as their one-year anniversary approached. The Tribe and its telecom counsel determined that an emergency request for a waiver or extension of the re-certification deadlines was the only feasible way to prevent massive loss of service, and immediately contacted the Commission. Those contacts started in August of 2016 and continued for seven months, as detailed below:

OST CONTACTS WITH FCC IN ATTEMPT TO OBTAIN EMERGENCY WAIVER OR EXTENSION OF LIFELINE RE-CERTIFICATION DEADLINES	
August 29, 2017	Letter from OST President Weston to ONAP and Chairman Pai, noting that service terminations on Pine Ridge would commence within a week, and requesting meeting to discuss emergency waiver or extension of re-certification deadline
September 29, 2017	Jon Canis email to ONAP, advising them that AT&T had begun to turn off service to Lifeline Service subscribers because of the inability to re-certify, and requesting a meeting between President Weston and Chairman Pai
October 24, 2017	Email from Jon Canis to ONAP, stating that 1,579 Pine Ridge residents have had their service terminated, and expressing “deep disappointment” that the Tribe has received no response from the Commission to our request for emergency relief
October 25, 2017	Email from Lyle Ishida of ONAP, advising Tribe’s request for emergency assistance “under consideration by senior decision-makers” and scheduling a meeting

October 27, 2017	Jon Canis meeting with Lyle Ishida and Sayuri Rajapakse of ONAP
October 31, 2017	Jon Canis email providing follow-up Powerpoint presentation to ONAP, describing the Lifeline service in detail, noting that 1,579 subscribers had their services terminated, asking for emergency waiver or extension of the re-certification deadline that would include restoring services to those Pine Ridge residents that had already been cut off, and proposing new methods of re-certification
November 4, 2017	Letter from President Weston to Chairman Pai, advising him that 1,579 Pine Ridge residents have had their service shut off, with more expected, and requesting emergency waiver or extension of the re-certification deadlines so that service could be restored to the Pine Ridge Lifeline Service subscribers who had been cut off
November 6, 2017	Jon Canis meeting with Lyle Ishida and Sayuri Rajapakse of ONAP Staff and Ryan Palmer of Telecom Access Policy Division
November 21, 2017	Email from Jon Canis, requesting meeting with Matthew Duchesne, the new Chief of ONAP
December 1, 2017	Jon Canis meeting with Matthew Duchesne, Janet Sievert, Sayuri Rajapakse of ONAP
January 3, 2018	Jon Canis meeting with Jodie Griffin and Nathan Eagan of WCB
January 17, 2018	Letter from President Weston to Matthew Duchesne of ONAP, advising that the number of Pine Ridge residents who have had their service turned off has reached 1,719 , and requesting an expedited meeting with Chairman Pai
February 13, 2018	Meeting between President Weston and Chairman Pai
March 13, 2018	WCB issues <i>Partial Waiver Order</i>
March 15, 2018	Email from Jon Canis to AT&T, advising them not to switch off any more Lifeline Services due to failure to re-certify, effective as of March 13, 2018, the date of the <i>Partial Waiver Order</i>

E. The Partial Waiver Order Correctly Identifies the Desperate Need for a Temporary Waiver of the Re-Certification Rules, and the Commission’s Broad Authority to Grant It, but Inexplicably Only Grants the Waiver Prospectively – Which Effectively Denies Relief to the Tribe

On March 13, 2018 – seven months after the President of the Oglala Sioux Tribe submitted the Tribe’s first emergency request for temporary waiver or extension of the Commission’s re-certification deadlines – the Chief of the Wireline Competition Bureau issued the *Partial Waiver Order*. The three-page *Order* accurately summarizes the correspondence with President Weston, including his meeting with the Chairman, notes the various reasons the Tribe has identified for the failure of its Lifeline subscribers to re-certify, and finds that the

“compelling and unique circumstances” described by the Tribe provide good cause to award a temporary waiver of the two provisions of the Commission’s rules that require termination of service for failure to re-certify. In this regard, the *Order* accurately characterizes the Tribe’s concerns over the loss of service, and the public interest imperative in granting relief, and for this the Tribe is grateful.

However, the *Partial Waiver Order* granted the requested relief only prospectively, from the date the *Order* was issued on March 13, 2018: “This waiver will provide more time for Pine Ridge Reservation residents whose Lifeline services have not been deactivated to ensure that they continue to receive service.” *Id.* at ¶ 8. By so limiting the waiver, the Wireline Competition Bureau expressly excludes from relief the **1,719** Pine Ridge residents who have had their service terminated since President Weston first sought help from the Commission on August 29, 2017.

II. GIVEN THE TRIBE’S REPEATED AND URGENT REQUESTS FOR RELIEF OVER A PERIOD OF SEVEN MONTHS, EQUITY, COMPASSION AND COMMON DECENCY REQUIRE APPLICATION OF THE WAIVERS RETROACTIVE TO AUGUST 29, 2017

As the Tribe has detailed above, President Weston and other Tribal representatives and their telecom counsel took every action possible to avert the termination of service to the Lifeline Service subscribers on Pine Ridge as soon as AT&T informed us that there was a problem. Yet despite repeated pleas for emergency action by the Commission, no action was taken for seven months, during which time **1,719** Pine Ridge residents lost their Lifeline Service. OST does not know what internal processes caused this delay – and the Commission Staff have been uniformly responsive and genuinely concerned when we have contacted them. But given this delay, in the face of the gravity of the loss of service to so many on Pine Ridge, the WCB’s decision to not apply the waivers retroactively is cruelly indifferent to the needs of the people of Pine Ridge.

This indifference is inexplicable, given that the Commission in the past, and Chairman Pai just last June, noted that in extremely remote rural areas like Pine Ridge, access to phone service can be a matter of life and death. Common concern for the physical safety of the people of Pine Ridge, and the Commission's trust responsibility to the Oglala Sioux Tribe, demand that the Commission amend the *Partial Waiver Order* to provide effective relief to the Tribe. Seven months after President Weston's first request for emergency relief, it is too late to prevent the shut-off of service to **1,719** Pine Ridge residents, but it is not too late to ameliorate that harm by immediately turning their service back on. The Oglala Sioux Tribe asks the Commission to fix the *Partial Waiver Order* by making its waivers retroactive to August 29, 2017.

III. THE TEMPORARY RETROACTIVE APPLICATION OF THE WAIVER PRESENTS VIRTUALLY NO RISK OF FRAUD OR ABUSE

The *Order* contains the standard recitation of the Commission's commitment "to guard against waste, fraud and abuse in the Universal Service Fund [] programs," and of course the Tribe agrees that the Commission must follow this mandate. But there is no suggestion in the *Order* that the retroactive application of the temporary waiver granted by the Commission – which would allow the immediate restoration of service to **1,719** Pine Ridge residents – is inconsistent with this commitment.

The Pine Ridge Reservation is one of the poorest places in the United States, with shockingly high rates of poverty and unemployment. It is unfortunate but true that there is no chance that a significant number of the **1,719** Lifeline service subscribers who have had their service terminated will be lifted out of poverty this year and so lose their Lifeline eligibility.

Moreover, the Tribe has proposed using the directors of Tribal and federal programs that are proxies for Lifeline eligibility to act as third-party verifiers. The Tribe and its telecom counsel and other pro bono outside advisors are actively engaging with the directors of the OST

Tribal Food Distribution Program, BIA General Assistance, Head Start and Federal Public Housing Assistance programs to identify the best programs, with the best-established and easily accessed databases, to be the sources of data to confirm annual re-certifications for Lifeline eligibility, and to support initial, in-person qualifications. OST representatives have already discussed this proposal in detail with Commission Staff, and will be providing further detail in comments filed in the Lifeline Reform proceeding later this week. The Tribe is confident that such a third-party verification system can be put into place within the coming months, and will provide more accurate and reliable data than the self-reporting procedures now used by AT&T. Moreover, this new third-party verification system will be consistent with the culture of Pine Ridge, and will meet the logistical challenges of providing service to one of the most rural and widely dispersed populations in the country.

IV. THE FULL RELIEF REQUESTED BY THE TRIBE IS URGENTLY NEEDED AND REQUIRES EMERGENCY ACTION BY THE COMMISSION

As discussed above, lack of access to phone service in extremely remote areas such as the Pine Ridge Reservation is life-threatening. The seven-month delay in providing relief to the Tribe has already resulted in significant harm to the people of Pine Ridge, and further delay would be inexcusable. The Tribe asks the Commission to move as expeditiously as humanly possible, and issue a revised *Waiver Order* within the coming days.

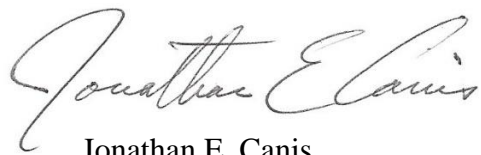
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V. CONCLUSION

For the reasons discussed above, the Oglala Sioux Tribe requests that the Commission revise the *Partial Waiver Order* issued by the Wireline Competition Bureau, to make the waiver of the Lifeline re-certification rules on the Pine Ridge Reservation retroactive to August 29, 2017 – the date when the President of the Oglala Sioux Tribe first requested emergency action from the Commission. Such action would allow the immediate restoration of cellular and data service to **1,719** members of the poorest and most underserved population in the United States.

Respectfully submitted,

Stephen Pourier, Sr., Director
Oglala Sioux Tribe Utilities Office
US Highway 18 East & Moccasin Rd.
Pine Ridge, SD 57770
Main: 605-867-5600
sjpourier@goldenwest.net



Jonathan E. Canis
Canis PLLC
4236 Mathewson Drive, N.W.
Washington DC 20011
202-294-5782
jon@canispllc.com

CERTIFICATE OF SERVICE

I, Jonathan E. Canis, do hereby certify that I have, this 22nd day of March, 2018, electronically filed the attached “Oglala Sioux Tribe Petition for Reconsideration and Emergency Relief to Reinstate Cellular and Data Service to Over 1,700 Residents of the Pine Ridge Indian Reservation” via the Commission’s ECFS system. I also sent courtesy copies via email to the following:

Chairman Ajit Pai
ajit.pai@fcc.gov

Kris Anne Monteith, Chief WCB
kris.monteith@fcc.gov

Commissioner Mignon Clyburn
mignon.clyburn@fcc.gov

Jodie Griffin, WCB
jodie.griffin@fcc.gov

Commissioner Michael O’Rielly
michael.orielly@fcc.gov

Nathan Eagan, WCB
nathan.eagan@fcc.gov

Commissioner Brendan Carr
brendan.carr@fcc.gov

Ryan Palmer, Telecom Access Policy Div.
ryan.palmer@fcc.gov

Commissioner Jessica Rosenworcel
jessica.rosenworcel@fcc.gov

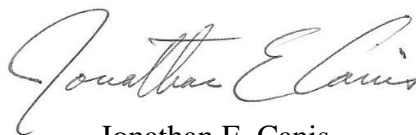
Matthew Duchesne, Chief ONAP
matthew.duchesne@fcc.gov

Jay Schwarz, Wireline Advisor to Chm. Pai
jay.schwarz@fcc.gov

Janet Sievert, ONAP
janet.sievert@fcc.gov

Sayuri Rajapakse, ONAP
sayuri.rajapakse@fcc.gov

Lyle Ishida
lyle.ishida@fcc.gov



Jonathan E. Canis
Canis PLLC
4236 Mathewson Drive, N.W.
Washington, D.C. 20011
202-294-5782
jon@canispllc.com